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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 FABIAN REYES SAUZA,

15 Defendant.
16
17

Case No. 2:21-mj-00583-EJY

**STIPULATION TO CLOSE
CASE**

18 IT IS HEREBY STIPULATED AND AGREED, by and between Jason
19 Frierson, United States Attorney, and Mina Chang, Assistant United States
20 Attorney, counsel for the United States of America, and Rene L. Valladares,
21 Federal Public Defender, and Benjamin F. J. Nemec, Assistant Federal Public
22 Defender, counsel for Fabian Reyes-Sauza, that Mr. Reyes-Sauza has successfully
23 completed all of the requirements in the case. See Exhibit A, Payment Receipt,
24 Exhibit B, Victim Impact Panel Certificate, Exhibit C, DUI Course Certificate,
25 and Exhibit D, 8 hour Online Alcohol Awareness course.
26

1 The parties request this Court allow Mr. Reyes-Sauza to withdraw his
2 guilty plea to Count One, amend Count One to Reckless driving, a violation of 36
3 C.F.R. § 4.2 and NRS 484B.653, have Mr. Reyes-Sauza plead guilty to the amended
4 Count One, and apply the original sentence to Count One. See ECF No. 9, p. 3
5 (plea agreement providing the parties will jointly move to request a dropdown if
6 Mr. Reyes-Sauza successfully completes his requirements).

7 DATED this 21st day of June 2021.
8

9 RENE L. VALLADARES
10 Federal Public Defender

JASON FRIERSON
United States Attorney

11 */s/ Benjamin F. J. Nemec*
12 By _____

13 BENJAMIN NEMEC
Assistant Federal Public Defender

/s/ Mina Chang
By _____

14 MINA CHANG
Assistant United States Attorney
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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4

5 Plaintiff,

6 v.

7 FABIAN REYES-SAUZA,
8

9 Defendant.

Case No. 2:21-mj-00583-EJY

ORDER

10
11 IT IS THEREFORE ORDERED that Defendant Fabian Reyes-Sauza
12 withdraw his guilty plea to Count One. Furthermore, Count One will be
13 amended to Count One to Reckless driving, a violation of 36 C.F.R. § 4.2 and NRS
14 484B.653. The Court accepts Mr. Reyes-Sauza's guilty plea to the amended
15 Count One, and sentences him to one year of unsupervised probation with the
16 following special conditions:

- 17 1. A \$500.00 fine with a \$10 mandatory penalty assessment;
18 2. A requirement to attend and complete a DUI course, Victim Impact
19 Panel, and an eight (8) hour online alcohol awareness course;
20 3. Not to return to Lake Mead National Recreation Area for a period of six
21 months; and
22 4. Not violate any local, state, or federal laws.

23 DATED this 21st day of June 2022.

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25 UNITED STATES MAGISTRATE JUDGE
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